

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT FOR THE  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

**MDL No. 3:16-md-2738-MAS-LHG**

JUDGE MICHAEL A. SHIPP  
MAG. JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

Civil Case No. 3:20-cv-11712-MAS-LHG

**SHIRLEY BARTSCHI** v. JOHNSON &  
JOHNSON, et al.

**DECLARATION OF KIMBERLY JOHANATHA TOTI PETERSEN AS  
CO-SUCCESSOR-IN-INTEREST PURSUANT TO CALIFORNIA CODE OF  
CIVIL PROCEDURE SECTION 377.32**

I, Kimberly Johanatha Toti Petersen, declare as follows:

1. The decedent in this matter is Shirley Bartschi. She was my mother.
2. Shirley Bartschi died of ovarian cancer on May 1, 2021, at her home in Walnut Creek, California.
3. A true and correct copy of the death certificate, with social security number redacted, is attached as Exhibit A to the instant Motion to Substitute Party-Plaintiff.

4. "No proceeding is now pending in California for administration of the decedent's estate."
5. I am one of the decedent's successors-in-interest (as defined by section 377.11 of the California Code of Civil Procedure) and a co-successor, along with my brother, Derek Jason Floyd Toti, to the decedent's interest in this action.
6. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in  
Alameda County, California on the date specified below.

Dated: August 24, 2023

Kimberly Johanatha Toti Petersen  
Kimberly Johanatha Toti Petersen (Aug 23, 2023 12:31 PDT)

Kimberly Johanatha Toti Petersen







# CCP 377.32 Declaration of Kimberly Petersen

Final Audit Report

2023-08-24

Created:	2023-08-24
By:	Clarissa Kearns (clarissa@whk-law.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAyev2rqPQrAXeWsgQDknsPSrzPKN-EuAh

## "CCP 377.32 Declaration of Kimberly Petersen" History

-  Document created by Clarissa Kearns (clarissa@whk-law.com)  
2023-08-24 - 7:06:03 PM GMT- IP address: 50.193.32.129
-  Document emailed to Kim Petersen (wereport@aol.com) for signature  
2023-08-24 - 7:06:26 PM GMT
-  Email viewed by Kim Petersen (wereport@aol.com)  
2023-08-24 - 7:37:48 PM GMT- IP address: 174.249.154.98
-  Signer Kim Petersen (wereport@aol.com) entered name at signing as Kimberly Johanatha Toti Petersen  
2023-08-24 - 7:41:57 PM GMT- IP address: 174.249.154.98
-  Document e-signed by Kimberly Johanatha Toti Petersen (wereport@aol.com)  
Signature Date: 2023-08-24 - 7:41:59 PM GMT - Time Source: server- IP address: 174.249.154.98
-  Agreement completed.  
2023-08-24 - 7:41:59 PM GMT

